

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA**

DOYLE LEE HAMM,

Plaintiff,

v.

JEFFERSON S. DUNN, Commissioner,  
Alabama Department of Corrections, et al.,

Defendants.

CIVIL ACTION NO.  
2:17-cv-02083-KOB

**JOINT MOTION FOR A QUALIFIED HIPAA PROTECTIVE ORDER**

COMES now the Plaintiff and the Defendants, by and through counsel, pursuant to this Court's standing uniform initial order, and jointly request this Court to enter a qualified protective order concerning medical records for the Plaintiff that are anticipated to be introduced at the upcoming hearing on January 31, 2018. The parties have filed a proposed order substantially in the form of the sample order, Appendix I, along with this motion.

Respectfully submitted,

STEVE MARSHALL  
ALABAMA ATTORNEY GENERAL

/s/ Bernard E. Harcourt

Bernard E. Harcourt

Counsel for Plaintiff

/s/ Thomas R. Govan, Jr.

Thomas R. Govan, Jr.

Deputy Attorney General

Beth Jackson Hughes

Assistant Attorney General

Counsel for Defendants

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of January, 2018, I served the above notice by email to the following: **Bernard Harcourt.**

*/s/ THOMAS R. GOVAN, JR.*

Thomas R. Govan, Jr.

Deputy Attorney General

OF COUNSEL:

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